

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LOU LOIBEN’S PERSONALITIES, INC.,)	
)	
Plaintiff,)	
)	Case No. 15 CV 1511
vs.)	
)	Honorable Jorge L. Alonso
)	
AKIB KHANANI (a/k/a “DJ Akib”, a/k/a “DJ)	Magistrate Mary M. Rowland
Akib Entertainment”))	
)	
Defendant.)	

**AGREED MOTION FOR ENTRY OF PERMANENT INJUNCTION
AND STIPULATION OF DISMISSAL PURSUANT TO SETTLEMENT**

Plaintiff Lou Loiben’s Personalities, Inc. (“Personalities”) and Defendant Akib Khanani (“Khanani”) hereby file this Agreed Motion for Entry of Permanent Injunction and Stipulation of Dismissal Pursuant to Settlement. In support of their motion, Kraft and Helm state as follows:

1. On February 19, 2015, Personalities filed a lawsuit against Khanani in the United States District Court for the Northern District of Illinois captioned *Lou Loiben’s Personalities, Inc., vs. Akib Khanani (a/k/a “DJ Akib” a/k/a “DJ Akib Entertainment”)*, Case No. 1:15-cv-01511, for Violation of the Copyright Act (Count I), Violation of the Illinois Trade Secret Act (Count II), Violation of the Lanham Act (Count III), Violation of the Illinois Uniform Deceptive Trade Practices Act (Count IV), and Violation of the Illinois Consumer Fraud and Deceptive Business Practices Act (Count V) (the “Lawsuit”).

2. On February 20, 2015, this court entered a Temporary Injunction Order against Khanani, enjoining Khanani, his agents, representatives, heirs, assigns, affiliates and all persons active in concert or participation with him from: (i) infringing Personalities’ copyrighted works

(e.g. Khanani must take down all copyrighted photographs that he or his agents or persons in concert with him posted on his website or social media accounts); (ii) encouraging or facilitating others to infringe upon Personalities' copyrighted works; and (iii) making any representations or implications of affiliation, connection, or association with or sponsorship or approval by Personalities (e.g., Khanani must remove all posts with the hashtag #personalities or #personalitiesinc on his website or social media accounts) (the "TRO").

3. On February 26, 2015, Personalities filed a motion for preliminary injunction on all counts in the Lawsuit.

4. The parties thereafter engaged in settlement discussions and have now reached agreement to settle all matters.

5. As part of the settlement, Khanani agreed to the entry of a permanent injunction in the form set forth in Exhibit A hereto.

6. As a result of the parties' agreement, and assuming this Court's entry of the Agreed Permanent Injunction and Order of Dismissal, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the parties stipulate that this case should be dismissed with prejudice, with the court to retain jurisdiction to enforce the injunction.

WHEREFORE, Personalities and Khanani respectfully request that this Court grant their Agreed Motion for Entry of Permanent Injunction and Dismissal Pursuant to Settlement, enter the attached Agreed Permanent Injunction and Order of Dismissal, and grant them such other and further relief as the Court should deem fair and equitable under the circumstances.

DATED: March 11, 2015

Respectfully Submitted,

Lou Loiben's Personalities, Inc.

By: /s/ Stephen J. Rosenfeld
One of its attorneys

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Respectfully Submitted,

Akib Khanani

By: /s/ Sreeram Natarajan
One of his attorneys

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EXHIBIT A

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NORTHERN DISTRICT OF ILLINOIS
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Plaintiff,)	
)	Case No. 15 CV 1511
vs.)	
)	Honorable Jorge L. Alonso
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AKIB KHANANI (a/k/a "DJ Akib", a/k/a "DJ)	Magistrate Mary M. Rowland
Akib Entertainment"))	
)	
Defendant.)	

**ORDER OF DISMISSAL AND
AGREED PERMANENT INJUNCTION**

This matter comes before the Court on the parties' joint stipulation for dismissal and agreed motion for permanent injunction pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) and 65.

THE COURT FINDS THAT pursuant to a settlement agreement, Plaintiff Lou Loiben's Personalities, Inc. ("Personalities") and Defendant Akib Khanani ("Khanani") jointly request that this Court enter the Permanent Injunction on the terms and in the form below:

WHEREFORE, THE COURT ENTERS AN AGREED PERMANENT INJUNCTION enjoining Akib Khanani, his agents, representatives, heirs, assigns, affiliates, and all persons active in concert or participation with him, from:

- (1) Infringing Personalities' copyrighted works;
- (2) Encouraging or facilitating others to infringe Personalities' copyrighted works; and
- (3) Making any representation or implication of affiliation, connection, or association with or sponsorship or approval by Personalities (*e.g.*,

Defendant must remove all posts with the hashtag #personalities or #personalitiesinc on his website or social media accounts).

IT IS FURTHER ORDERED that, pursuant to the parties' agreement, all remaining claims are dismissed with prejudice to the re-filing of same.

IT IS FURTHER ORDERED that all attorneys' fees, costs of court and expenses be borne by the party incurring the same.

This is a final judgment as to the parties herein. The Court shall maintain continuing jurisdiction over this action for the purpose of enforcing this Permanent Injunction.

Judge: _____

Dated: _____

Order prepared by:

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